REMARKS

The Examiner has rejected Claims 1-4, 10-15, 16-23, and 25-26 under 35 U.S.C. 103(a) as being unpatentable over Lakritz (USPN 6,623,529). Applicant respectfully disagrees with this rejection, especially in view of the amendments made hereinabove. For example, applicant has incorporated into each of the independent claims the subject matter of Claims 2, 3 and 12 et al.

The Examiner admits that Lakritz fails to explicitly teach applicant's claimed "generating an include file containing the variables and associated character strings" and "adding a reference to the include file in the modified version of the computer file" (see all independent claims). The Examiner continues by stating that it would have been obvious to one of ordinary skill in the art at the time of the invention to conclude that one way to recombine the part of the computer file that is country/language dependent in a modified computer file would have been reference to reference it as an "include file" in the modified computer file providing the benefit of modifying only country/language-specific content when a change in such information is requested.

Lakritz is silent with respect to any technique of "generating an include file containing the variables and associated character strings" and "adding a reference to the include file in the modified version of the computer file." Only applicant teaches and claims the generation of a specific file that contains variables and associated character strings, in the specific context claimed, which allows for the convenient translation process embodied in each of the independent claims. More information regarding resultant significant advantages of such claim limitations will be set forth hereinafter in greater detail.

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be

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found in the prior art and not based on applicant's disclosure. *In re Vaeck,* 947 F.2d 488, 20 USPQ2d 1438 (Fed.Cir.1991).

Applicant respectfully asserts that at least the third element of the *prima facie* case of obviousness has not been met, since the prior art reference fails to teach or suggest all the claim limitations. It appears that the Examiner has relied on an inherency argument regarding the above emphasized claim limitations. In view of the arguments made hereinabove, any such inherency argument has been adequately rebutted, and a notice of allowance or a specific prior art showing of such claimed features, in combination with the remaining claim elements, is respectfully requested (see MPEP 2112).

It appears that the Examiner relies on a similar argument regarding applicant's claimed "translating the character strings of the include file to a language different than that of the character strings in the original computer file" (see former subject matter of Claim 2 et al., now incorporated into each of the independent claims).

Specifically, the Examiner admits that there is no disclosure or teaching of such claim limitations in Lakritz, but such features would have been obvious because whether or not the character strings exist in the same file as the original, or in a separate file, the outcome is the same; namely the final result is a translated file that is displayed to the user.

Applicant respectfully disagrees with this assertion, since similarities in outcomes should not be the deciding factor as to whether the claimed features would be obvious. In fact, there is significant advantage associated with the specific way applicant achieves the intended result. Just by way of example, by utilizing a *separate* include file that is translated into a different language and by adding a reference to the translated include file in the modified file, the translation need not be carried out *each* time the translated content is requested. Of course, there are numerous other mutually exclusive advantages associated with applicant's "include file," and the specific context in which it is claimed.

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Again, applicant respectfully asserts that at least the third element of the *prima facie* case of obviousness has not been met, since the prior art reference fails to teach or suggest all the claim limitations. It again appears that the Examiner has relied on an inherency argument regarding the above emphasized claim limitations. In view of the arguments made hereinabove, any such inherency argument has been adequately rebutted, and a notice of allowance or a specific prior art showing of such claim features, in combination with the remaining claim elements, is respectfully requested (See MPEP 2112).

Despite this clear distinction already present in the claims and in the spirit of expediting the prosecution of the application, applicant now claims:

"wherein the modified version of the computer file and the include file is stored in a Web server connected to the Internet;
wherein adding a reference to the include file comprises adding a reference to a translated version of the include file based on a user requesting a Web page from the Web server" (see this and similar language in each of the independent claims).

Again, for the reasons set forth hereinabove, a notice of allowance or a specific prior art showing of such claimed features, in combination with the remaining claim elements, is respectfully requested.

Still yet, applicant brings to the Examiner's attention new Claims 27-39 below, which are deemed to be allowable:

"wherein the computer file is read into a buffer, and a localizer searches for comments, wherein, if comments are found, the comments are each replaced with a comment token and added to a comment dictionary, the localizer further searches for scripts, wherein, if scripts are found, the scripts are each replaced with a script token and added to a script dictionary, the localizer further searches for HTML tags, wherein, if HTML tags are found, the HTML tags are each replaced with an HTML tag token and added to a tag dictionary, the localizer further searches for key words, wherein, if key words are found, the key words are each

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replaced with a key word token and added to a key word dictionary, whereby only the tokens and text strings are remaining thereafter" (see Claim 27);

"wherein the text strings are parsed, extracted and added to a text string dictionary for being sorted by string length" (see Claim 28);

"wherein the localizer parses the scripts by pulling a first script from the script dictionary and searching for text strings within the first script, wherein each text string is added to a script-string dictionary" (see Claim 29);

"wherein the localizer pulls each text string from the script-string dictionary and searches for string items" (see Claim 30);

"wherein the string items are replaced with tokens in the first script" (see Claim 31);

"wherein each string from the script-string dictionary is converted to a variable and is searched for HTML tags" (see Claim 32);

"wherein each HTML tag is replaced with a token and added to a script-tag dictionary" (see Claim 33);

"wherein the strings within the script-string dictionary are searched for text strings, and each text string is added to a sub-string dictionary" (see Claim 34);

"wherein each text string from the sub-string dictionary is replaced with a variable" (see Claim 35);

"wherein null strings are removed" (see Claim 36);

"wherein the localizer replaces all of the HTML tag tokens with original HTML tags" (see Claim 37);

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"wherein the buffer is searched for text strings from the string dictionary, and each text string is replaced with a variable" (see Claim 38);

"wherein the comment tokens, the keyword tokens, the HTML tag tokens, and the script tokens are replaced with the corresponding original comment, keyword, tag, and script, respectively" (see Claim 39);

A notice of allowance or a specific prior art showing of such claimed features, in combination with the remaining claim elements, is respectfully requested.

To this end, all of the independent claims are deemed allowable. Moreover, the remaining dependent claims are further deemed allowable, in view of their dependence on such independent claims.

In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 505-5100. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 50-1351 (Order No. NAIIP138/00.152.01).

Respectfully submitted,
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